

## IN THE DISTRICT COURT OF LANCASTER COUNTY, NEBRASKA

RENAE VANDERSLICE,	)	CASE NO.
	)	
Plaintiff,	)	
	)	COMPLAINT, REQUEST FOR
v.	)	JURY TRIAL AND PRAECIPE
	)	
LOWE'S HOME CENTERS, LLC.,	)	
	)	
Defendant.	)	

COMES NOW the Plaintiff, Renae Vanderslice, and for her cause of action against the Defendant, states as follows:

1. At all times relevant, Plaintiff Renae Vanderslice was a resident of Lincoln, Lancaster County, Nebraska.
2. At all times relevant, Lowe's Home Centers, LLC. is a corporation duly authorized to do business in the state of Nebraska. The Defendant operates a retail commercial business which includes a large store and adjoining parking lot located at 6101 Apples Way in Lincoln, Lancaster County, Nebraska.
3. In the afternoon of August 29, 2017, Plaintiff parked her vehicle at the parking lot provided on the property maintained by the Defendant. She exited her vehicle and began to walk to the front of the store in order to enter the store to shop.
4. Plaintiff fell due to an unsafe condition including, but not limited to, a depression in said parking lot. The parking lot had a

depression in the surface making it uneven and caused the Plaintiff to trip and fall.

5. As a proximate result of her fall, Plaintiff suffered injuries, some or all of which are permanent in nature, including an injury to her right ankle and right shoulder.

6. A proximate cause of the Plaintiff falling and being injured was the negligence of the Defendant. The Plaintiff was a lawful entrant on the Defendant's premises at all times relevant.

7. The Defendant either created the unsafe condition, knew of said condition or, by the exercise of reasonable care, would have discovered the unsafe condition.

8. The Defendant should have realized that the unsafe condition involved an unreasonable risk of harm to such lawful entrants.

9. The Defendant should have expected that lawful entrants, such as the Plaintiff, would either a) would not discover or realize the unsafe danger or b) would fail to protect themselves against said danger.

10. The Defendant failed to use reasonable care to protect lawful entrants against the danger.

11. The unsafe condition was a proximate cause of the damages and injuries suffered by the Plaintiff.

12. The Plaintiff has suffered past, present and future disability, inconvenience, loss of earnings and a permanent diminished earning

capacity, pain, suffering and has been caused to incur healthcare expenses including, but not limited to:

- a) Nebraska Orthopedic & Sports Medicine \$4,716.00
- b) Lincoln Radiology \$164.00

Further, Plaintiff will incur future healthcare expenses as a result of her injuries.

WHEREFORE Plaintiff requests judgment against the Defendant in an amount which will fairly and justly compensate her for her injuries to date together with costs of this action and such other and further relief as the Court deems just.

RENAE VANDERSLICE, Plaintiff

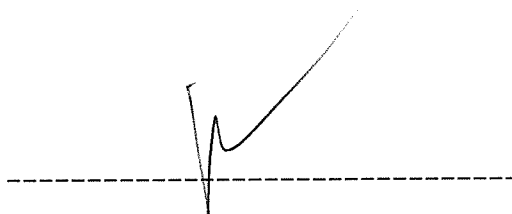


---

Vincent M. Powers #15866  
POWERS LAW  
411 South 13<sup>th</sup> Street, Suite 300  
PO Box 84936  
Lincoln, NE 68501-4936  
402/474-8000  
[powerslaw@me.com](mailto:powerslaw@me.com)

#### REQUEST FOR JURY TRIAL

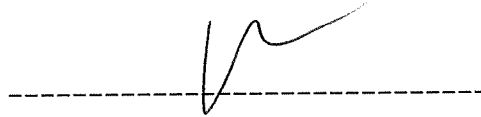
Plaintiff requests a jury trial to be held in Lincoln, Lancaster County, Nebraska.



PRAECIPE

Please issue a summons in the above captioned matter and return the same to Plaintiff's attorney for service upon the Defendant by certified mail at the following address:

Lowe's Home Centers, LLC.  
c/o CSC Lawyers Incorporating Service Company, Registered Agent  
233 South 13<sup>th</sup> Street, Suite 1900  
Lincoln, NE 68508

A handwritten signature in black ink is written over a horizontal dashed line. The signature is stylized, starting with a vertical stroke, followed by a series of loops and a final upward stroke.